

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CLARENCE L. EARLE

a/k/a ERIC ALLEN

a/k/a LEMONT TIPPET

a/k/a THEODORE WILSON

a/k/a ROBERT PREVAL

Case No. 04-cr-10065 MLW

GOVERNMENT'S PROPOSED EXHIBIT LIST

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Seth P. Berman, hereby submits this Proposed Exhibit List in the above-captioned matter. The government reserves the right to supplement, modify, or withdraw from this list.

- 1) Full Fingerprint Card taken on February 13, 2004 by Special Agent William Sansone (2 pages)
- 2) Full Fingerprint Card taken on September 24, 1992 during defendant's arrest in the Western District of New York for Attempted Illegal Reentry (1 pages)
- 3) Full Fingerprint Card taken on January 25, 1990, after defendant's arrest in the District of Colorado
- 4) "Notice of Intent / Decision to Reinstate Prior Order," April. 12, 2001 by Bruce Chadbourne (1 page)
- 5) "Notice of Intent / Decision to Reinstate Prior Order," February 12, 2004 by Paul

- Sterling (1 page)
- 6) "Warrant for Deportation" (January 3, 1991) (includes right thumb print) (2 pages)
 - 7) "Warrant of Removal/Deportation" (August 21, 2001 and July 10, 2002) (includes right index print) (2 pages)
 - 8) "Warning for Person Ordered Removed or Deported" (August 21, 2001) (1 page)
 - 9) Fingerprint Comparison Findings (not yet created)
 - 10) Enlargement of Fingerprint Cards submitted for comparison
 - 11) Certificate of Nonexistence of Record (February 24, 2004) (1 page)
 - 12) Jamaican Emergency Certificate to Facilitate Travel (March 5, 2002) (2 pages)
 - 13) Jamaican Birth Certificate of Clarence Lynval Earle (2 pages)
 - 14) "Judgement Including Sentence", United States v. Clarence Lynval Earle, 90-cr-109, United States District Court for the District of Colorado (4 pages)
 - 15) Plea Agreement, United States v. Clarence Lynval Earle, 90-cr-109, United States District Court for the District of Colorado (6 pages)
 - 16) "Judgement in a Criminal Case", United States v. Eric Allen, 92-cr-00239, United States District Court for the Western District of New York (4 pages)
 - 17) Plea Agreement, United States v. Eric Allen, 92-cr-00239, United States District Court for the Western District of New York (8 pages)
 - 18) Transcript of Plea, United States v. Eric Allen, 92-cr-00239, United States District Court for the Western District of New York (30 pages)
 - 19) Affidavit of Clarence Lynnal (sic) Earle, Janaury 25, 1990 (2 pages)

- 20) Transcript of Deportation Hearing, Matter of Clarence Linval Earle, February 12-22, 1990 (34 pages)
- 21) Itinerary from Denver to Jamaica via Miami for Clarence Earle, January 3, 1991 (1 page)
- 22) Record of Persons/Property Transferred, January 3, 1991 (1 page)
- 23) Birth Certificate of Theodore Martin Wilson, as provided by defendant to ICE officers (2 sided document)
- 24) Complete Vital Record of Theodore Martin Wilson from the Pennsylvania Department of Health (1 page)

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Seth P. Berman
SETH P. BERMAN
Assistant U.S. Attorney

Dated: March 15, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Paul Markham, Esq.
58 Orient Street
Melrose, MA 02176

This 15th day of March, 2005.

/s/ Seth P. Berman
SETH P. BERMAN
Assistant U.S. Attorney